Plaintiffs' Exhibit 106

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC.   MDL No. 2843

CONSUMER PRIVACY USER   Case No. 18-md-02843-VC-JSC

PROFILE LITIGATION

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CONFIDENTIAL

REMOTE DEPOSITION OF JACKIE CHANG

Thursday, December 16, 2021

Job No. 4976949

Reported Remotely and Stenographically by:

JANIS JENNINGS, CSR No. 3942, CLR, CCRR

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8   REMOTE DEPOSITION OF JACKIE CHANG, located

9   in Hillsborough, California, taken on behalf of the

10 Plaintiffs, beginning at 9:43 a.m., on Thursday,

11 December 16, 2021, sworn remotely by Janis Jennings,

12 Certified Shorthand Reporter No. 3942, CLR, CCRR,

13 located in the City of Walnut Creek, County of

14 Contra Costa, State of California.

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 1   REMOTE APPEARANCES:

 2

 3      For Plaintiffs:

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 1   APPEARANCES:

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15       Also Remotely Present:

16               DANIEL GARRIE, SPECIAL MASTER

17               JAMS

18               555 W. 5th Street, 32nd Floor

19               Los Angeles, California 90013

20

21               IAN CHEN, ESQ., Facebook, Inc.

22               SHAWNA HAYNES, Videographer

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 1  again?                                            11:23

 2       Q.   Do you know when Facebook first started 11:23

 3  using APIs with its partners?                     11:23

 4       A.   I'm not sure I understand that question. 11:23

 5  Technically, I don't know.                        11:23

 6       Q.   Do you know who came up with the various 11:23

 7  APIs that Facebook has?                           11:23

 8       A.   No.                                      11:23

 9       Q.   Are you familiar with the concept of Friend 11:23

10  Sharing on the Facebook platform?                 11:23

11       A.   I think I've heard of it, but I don't know 11:23

12  what it is.                                        11:23

13       Q.   Are you aware that on the Facebook platform 11:23

14  for a period of time, when a friend downloaded an 11:24

15  app, that app could obtain access to that person's 11:24

16  friends via Friend Sharing APIs?                  11:24

17            MR. FALCONER:  Objection.  Form.        11:24

18            Go ahead.                                11:24

19            THE WITNESS:  I don't remember.          11:24

20  BY MR. LOESER:                                     11:24

21       Q.   You don't remember anything about that? 11:24

22       A.   No.                                      11:24

23       Q.   That's not something you were involved at 11:24

24  all in?                                            11:24

25       A.   I don't remember.                        11:24
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 1              control they want/need we are          11:56

 2              working towards a shared goal" --       11:56

 3              DEPOSITION REPORTER:  "However, in the  11:56

 4  process of providing users with the control..."  Go  11:56

 5  ahead, please.

 6  BY MR. LOESER.

 7       Q.   "...they want/need, we are working

 8              towards a shared goal of greater        11:56

 9              engagement and long-term health of      11:56

10              the ecosystem that will mutually        11:56

11              benefit both users and our              11:56

12              developers."                            11:56

13              Do you see that?                        11:56

14       A.   Yes.                                      11:56

15       Q.   Now, Miss Chang, do you recall being      11:56

16  involved in the -- making the changes that are      11:56

17  referred to here?                                   11:56

18       A.   I don't.                                  11:56

19       Q.   Why don't we go down this document to     11:56

20  page 2, under the heading "Breaking Changes."       11:56

21              Do you remember your involvement and the  11:56

22  conversation about breaking changes?                11:56

23       A.    I remember breaking changes as a concept,  11:56

24  but I don't remember specific conversations.        11:57

25       Q.    Okay.  What was "breaking changes" as a   11:57
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 1     Q.    "Apps can still power great,               11:58
 2           meaningful social experiences for          11:58
 3           their users and prompt a user to           11:58
 4           invite their friends to participate        11:58
 5           in the experience.  Once a friend          11:58
 6           has installed the app, they can            11:58
 7           determine how much information they        11:58
 8           are willing to share at their              11:58
 9           discretion."                               11:58
10           Do you see that?                           11:58
11     A.    Yes.                                       11:58
12     Q.    Do you recall conversations around         11:58
13   deprecating friends permissions?                   11:58
14     A.    I don't.                                   11:58
15     Q.    You have no memory of that?                11:58
16     A.    Not specifically.                          11:58
17     Q.    Do you know what "deprecate" means?        11:58
18     A.    Yes.  To -- to remove or wind down or end. 11:58
19     Q.    And so what Platform 3.0 was intended to   11:58
20   introduce was the concept of empowering users to   11:59
21   share their data with an app when they have        11:59
22   expressed intent; is that right?                   11:59
23     A.    Whatever was stated there.                 11:59
24     Q.    And so if a user hadn't expressed that     11:59
25   intent, their information shouldn't be shared, and 11:59
```

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```
 1     A.    So I --                                       12:08

 2           MR. FALCONER:  Objection to form.             12:08

 3           THE WITNESS:  So I don't remember enough to   12:08

 4  make that connection.                                  12:08

 5  BY MR. LOESER:                                         12:08

 6     Q.    So looking at your email, it looks like you   12:08

 7  came up with a format for dealing with T0 partners     12:08

 8  with non-standard agreements and specific              12:09

 9  categories; is that right?                             12:09

10           DEPOSITION REPORTER:  Excuse me.  There was   12:09

11  an interruption in the audio.  Can you repeat your     12:09

12  question, please, Counsel.                             12:09

13  BY MR. LOESER:                                         12:09

14     Q.    Yeah.  Looking at your email, it appears      12:09

15  that you're sorting out which partners would lose      12:09

16  access to friends and would reach with permissions     12:09

17  and which ones would not; right?                       12:09

18     A.    So, then, I don't remember enough to make     12:09

19  that assertion.                                        12:09

20     Q.    Okay.  Well, let's just look through your     12:09

21  tabs.  The first tab you have -- these are your        12:09

22  words; right?  You wrote this email?                   12:09

23     A.    It looks like it, yes.                        12:09

24     Q.    The T0 tab -- and, again, "T0" means         12:09

25  something --
```

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 1   negative press."                                    12:12

 2       Q.   And what you mean there is when you take   12:12

 3   away these friends and read permissions, there could 12:12

 4   be negative press?                                  12:12

 5       A.   Again, I --                                12:12

 6            MR. FALCONER:  Objection.  Form.           12:12

 7            THE WITNESS:  -- I don't recall at the time 12:12

 8   to specify exactly what it is connected to.         12:12

 9   BY MR. LOESER:                                      12:12

10       Q.   Just a blank slate for you?                12:12

11            MR. FALCONER:  Objection.  Form.           12:12

12            THE WITNESS:  Sorry.  Is that a question   12:12

13   or...                                               12:12

14   BY MR. LOESER:                                      12:12

15       Q.   Yeah.  Yeah.  Even looking at the email that 12:12

16   you wrote about this, you just can't remember       12:12

17   anything about it?                                  12:12

18       A.   Yes.  So, again, I was transitioning to a  12:12

19   new role, so this was not the top of my mind, and I 12:12

20   don't remember this.                                12:12

21       Q.   Is it fair to say that it was at the top of 12:12

22   your mind when you wrote this?                      12:12

23       A.   I don't remember at that time.            12:12

24       Q.   Well, let's look at the next bullet:       12:12

25            "Strategic value:  Key integrations        12:13
```

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```
 1              that use read stream or friend data      12:13

 2              and drive value to Facebook.  Should     12:13

 3              decide if we allow certain use cases     12:13

 4              that are of strategic value to           12:13

 5              Facebook."                               12:13

 6              What does it mean if something is of     12:13

 7    "strategic value to Facebook"?                     12:13

 8        A.   So I can't infer what it meant at that time, 12:13

 9    but strategic value generally means something that 12:13

10    is of business value.                              12:13

11        Q.   Okay.  And so you're making a recommendation 12:13

12    here for how to deal with integrations that involve 12:13

13    strategic value; is that right?                    12:13

14        A.   I don't remember specifically, so I don't 12:13

15    know how to answer that.                           12:13

16        Q.   Okay.  It looks like in the email, you knew 12:13

17    enough about what read stream was or friend data to 12:13

18    use those words in this email and talk about what  12:13

19    should happen with that?                           12:14

20        A.   So, again, I don't remember enough at the 12:14

21    time to say that was the state of my mind.  I don't 12:14

22    know.                                              12:14

23        Q.   And what do you mean when you say, "Should 12:14

24    decide if we allow certain use cases that are of   12:14

25    strategic value to Facebook"?                      12:14
```

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 1   that you came up with for dealing with, among        12:27

 2   others, strategic partners and that was in the       12:27

 3   context of Platform 3 implementation; right?         12:27

 4          MR. FALCONER:  Objection.  Argumentative.     12:27

 5          THE WITNESS:  So, again, I don't know.        12:27

 6   BY MR. LOESER:                                        12:27

 7      Q.   Now, Miss Chang, you were directly involved  12:28

 8   in making the determination -- coming up with a      12:28

 9   framework for the determination of what partners     12:28

10   would continue to have access to friends             12:28

11   permissions; right?                                  12:28

12      A.   So, again, I don't remember enough to say    12:28

13   that it was a determination.  I just prepared a      12:28

14   spreadsheet that was requested by Ime and Chris, as  12:28

15   it said in the email.                                12:28

16      Q.   Tell me everything you can remember about    12:28

17   your involvement in figuring out which partners      12:28

18   should continue to have access to friends            12:28

19   permissions.                                         12:28

20      A.   So, again, I don't remember.  I moved on to  12:28

21   Internet.org.  I don't know what happened after that 12:28

22   spreadsheet.                                         12:28

23      Q.   I didn't ask you if you remember what        12:28

24   happened after that.  I am just asking you to        12:28

25   describe for me, what is the sum total of what you   12:28
```

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 1    remember about your role in figuring out which        12:28

 2    partners would continue to have access to friends     12:28

 3    permissions.                                          12:29

 4         A.    I don't remember.                          12:29

 5         Q.    Did you receive annual performance reviews? 12:29

 6         A.    In what year?                              12:29

 7         Q.    In any year.                               12:29

 8         A.    I received a performance review.           12:29

 9         Q.    And in connection with your performance    12:29

10    review, were you required to describe what you did    12:29

11    during the year that was being reviewed?              12:29

12         A.    I believe so, yes.                         12:29

13         Q.    And in those performance reviews, were you 12:29

14    careful to make sure that you described all of the    12:29

15    important, or at least the most important things,     12:29

16    you worked on?                                        12:29

17         A.    At that time, yes.                         12:29

18         Q.    And so if this transition to Platform 3 and 12:29

19    your role in determining which partners would         12:29

20    continue to have access to friends permissions was    12:29

21    an important part of that year, that would be likely  12:29

22    discussed in the performance review?                  12:30

23         A.    I don't know.  I can't speculate that.     12:30

24         Q.    Okay.  Would that be generally an accurate 12:30

25    statement, though, that the tasks that you performed  12:30
```

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 1     Q.   And under the heading, "Capabilities        14:25

 2  Cleanup," can -- the first bullet says, "Audit       14:25

 3  existing private API whitelists," then "who has what 14:25

 4  and why?" "GOAL:  Cleaner, more equitable, more      14:25

 5  supportable Platform."                               14:26

 6          Do you see that?                             14:26

 7     A.   Yes.                                         14:26

 8     Q.   And, Miss Chang, do you recall being         14:26

 9  involved in the audit of existing private API        14:26

10  whitelists?                                          14:26

11     A.   No, I don't recall.                          14:26

12     Q.   And do you recall the effort to figure out   14:26

13  what partners or apps were whitelisted and why?      14:26

14     A.   I don't remember.                            14:26

15     Q.   Do you remember anything at all about any    14:26

16  involvement you had in the subject matter of         14:26

17  whitelists?                                          14:26

18     A.   Sorry.  Can you state that question again?   14:26

19     Q.   Do you remember being involved in any way in 14:26

20  figuring out what partners were whitelisted and why? 14:26

21     A.   Not -- I don't remember.                     14:26

22     Q.   This slide over on the right side refers to  14:27

23  "Gracefully manage this huge transition. "           14:27

24          Was the rollout to Platform 3.0 a huge       14:27

25  transition?                                          14:27
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 1     A.   Yes, I see that there.                    14:28

 2     Q.   And do you see that those are -- those two  14:28

 3  deprecations are the deprecations of permissions   14:29

 4  that are most widely used by apps on this table.  Is  14:29

 5  that your understanding?                           14:29

 6     A.   So -- yeah, so I don't know the context of  14:29

 7  that, so I don't -- I don't know if it really is or  14:29

 8  isn't.                                             14:29

 9     Q.   Okay.  But you see that for "Feed API and  14:29

10  read_stream," it says, "Number of apps requesting  14:29

11  these permissions per day," and it says, "7,003"?  14:29

12     A.   Yes, I see that.                           14:29

13     Q.   And do you see under "friends_permissions,"  14:29

14  it says, "Number of apps requesting these          14:29

15  permissions today," it says "18,067"?              14:29

16     A.   Yes, I see that.                           14:29

17     Q.   Okay.  Go to the next slide.               14:29

18          Now, Miss Chang, you were involved in      14:29

19  preparing for the deprecations of these permissions,  14:29

20  were you not?                                      14:29

21     A.   Again, I -- I don't remember.             14:30

22     Q.   Okay.  If you look at the first bullet, it  14:30

23  says:                                              14:30

24          "Pre-enforce use existing policies to      14:30

25          revoke app access (note:  No appetite      14:30
```

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```
 1          to do this at present)."              14:30

 2          Do you recall there being no appetite to use 14:30

 3   existing policies to revoke app access?      14:30

 4      A.  Again, I don't remember this.         14:30

 5      Q.  Okay.  And you look at the next one:  14:30

 6          "Standard Apps are notified on P-day  14:30

 7          and have n-days to comply (vast       14:30

 8          majority of apps)."                   14:30

 9          Do you recall what that refers to?    14:30

10      A.  No.                                   14:30

11      Q.  This next bullet item is:             14:30

12          "Extension Apps given n+x days to     14:30

13          comply due to long upgrade cycles -   14:30

14          e.g., devices (SmartTV, in-car,       14:30

15          mobile OS's)."                        14:30

16          Do you have an understanding of what  14:30

17   "extensions" are?                            14:30

18      A.   I know what an extension is, but I don't -- 14:30

19   I don't recognize in this context.           14:30

20      Q.  Yeah.  You don't recall in any way your 14:30

21   involvement in sorting out whether any partners were 14:30

22   given extensions of the friends permission   14:31

23   deprecation?                                 14:31

24      A.   I don't remember.                    14:31

25      Q.  Okay.  And:                           14:31
```

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```
 1              "Exception Apps to be whitelisted           14:31

 2              indefinitely due to their strategic         14:31

 3              value to Facebook."                         14:31

 4              That must be something that you remember;   14:31

 5   right?                                                 14:31

 6      A.    I don't remember it.                          14:31

 7      Q.    Okay.  You don't recall the role you played   14:31

 8   in determining which whitelisted apps -- which apps    14:31

 9   should be whitelisted indefinitely due to their        14:31

10   strategic value to Facebook?                           14:31

11      A.    Correct.  I don't remember.                   14:31

12      Q.    As you sit here today, can you recall the     14:31

13   difference between providing an app with an            14:31

14   extension versus an exception?                         14:31

15      A.    No, I can't.                                  14:31

16      Q.    Do you think you ever knew what the           14:31

17   difference was?                                        14:31

18      A.    I don't know.                                 14:31

19              MR. LOESER:  We can go to the next exhibit.  14:31

20              (Exhibit 13 marked for identification.)     14:32

21   BY MR. LOESER:                                         14:32

22      Q.    This will be Exhibit 13, which is an          14:32

23   email from Simon Cross to you and others, dated        14:32

24   December 10th, 2013, the subject "Re:  Simon's         14:32

25   updates - 6th of December."                            14:32
```

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```
 1          MR. FALCONER:  Objection.              14:35

 2          THE WITNESS:  I don't remember.        14:35

 3   BY MR. LOESER:                                14:35

 4      Q.   Okay.  Well, let's look at what it says you  14:35

 5   were doing --                                 14:36

 6          SPECIAL MASTER GARRIE:  Sorry.  When we get  14:36

 7   to a breaking point -- any idea when that may be?  14:36

 8          MR. FALCONER:  I was thinking after the  14:36

 9   next -- after we are done with this document.  14:36

10          MR. LOESER:  That's fine.              14:36

11          SPECIAL MASTER GARRIE:  And then I would  14:36

12   like all the lawyers to be moved into another room.  14:36

13   Thank you.                                    14:36

14   BY MR. LOESER:                                14:36

15      Q.   Miss Chang, if you look at the Platform  14:36

16   Simplification task, you will see the last bullet.  14:36

17   Can you read that last bullet, please?        14:36

18      A.   "Jackie leading on putting together   14:36

19           a new whitelist process with Legal    14:36

20           and Product."                         14:36

21      Q.   And is that accurate?                 14:36

22      A.   Again, I don't remember.              14:36

23      Q.   So as you sit here today, you have zero  14:36

24   recollection of your being tasked with leading on  14:36

25   putting together a new whitelist process with Legal  14:36
```

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```
 1   and Product?                                       14:36

 2        A.    I don't remember this specifically.     14:36

 3        Q.    Do you remember anything at all about it?   14:36

 4        A.    No, I don't.                            14:36

 5        Q.    Okay.  Let's move up the string to page 2 of   14:37

 6   the string under the same heading, "Platform       14:37

 7   Simplification."                                    14:37

 8              You will see that this update, if you go   14:37

 9   farther up the string, is November 25th, 2013.  It   14:37

10   was sent by Simon Cross.  The first recipient in the   14:37

11   "to" list is you.                                   14:37

12              Do you see that?                         14:37

13        A.    Sorry.  What date?                       14:37

14        Q.    November 25th, 2013.                     14:37

15        A.    Okay.                                    14:37

16        Q.    First recipient, first person Simon put on   14:37

17   that "to" line was Jackie Chang; right?             14:37

18        A.    Well, I don't know if I'm -- I'm the first   14:37

19   person that shows up there.                         14:37

20        Q.    All right.  And let's go down to "Platform   14:37

21   Simplification."  So why don't you read the second   14:37

22   bullet.                                             14:37

23        A.    "New Whitelisting process -- Jackie      14:37

24              working closely with Marie and Legal     14:37

25              to design a fast but safe process        14:37
```

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```
 1              for whitelisting apps.  Spec for        14:38

 2              updates to tools in progress and        14:38

 3              moving towards build-stage.  Audit      14:38

 4              of existing Capabilities for legal      14:38

 5              risk is underway."                      14:38

 6      Q.   So do you remember working closely with   14:38

 7   Marie in legal?                                    14:38

 8      A.   I don't.                                   14:38

 9      Q.   And who is Marie?                          14:38

10      A.   I don't know which Marie it may be referring 14:38

11   to.                                                14:38

12      Q.   Okay.  And so, Miss Chang, you're telling 14:38

13   the jury that even though this bullet indicates that 14:38

14   you were "working closely with Marie in Legal to  14:38

15   design a fast but safe process for whitelisting

16   apps," you have utterly no recollection of anything 14:38

17   relating to that task?                             14:38

18      A.   Correct.                                   14:38

19           MR. LOESER:  This is a fine time to take a 14:38

20   break, as Special Master Garrie has requested.     14:38

21           THE VIDEOGRAPHER:  Okay.  This marks the end 14:39

22   of media No. 3 in the deposition of Jackie Chang.  14:39

23   Going off the record.  The time is 2:39.           14:39

24           (Off the record.)                          14:39

25           THE VIDEOGRAPHER:  This marks the beginning 15:04
```

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```
 1      A.    Yes.                                    15:20

 2      Q.    Okay.  If you could please read the third  15:20

 3   bullet.                                            15:20

 4      A.    "Removing access to non-app friends.    15:20

 5            Friend_permissions being deprecated -    15:20

 6            apps will only get data about people    15:20

 7            who've explicitly logged-in with        15:20

 8            Facebook, not that user's incognizant   15:20

 9            friends.  We're building new APIs to    15:20

10            handle tagging non-app friends and      15:20

11            inviting your friends to use/play the   15:20

12            app with you."                          15:20

13      Q.    Okay.  And do you recall the -- that as part 15:20

14   of this PS12 update, there was going to be the   15:20

15   removal of access to non-app friends permissions?  15:20

16      A.    So I don't remember.                    15:21

17      Q.    Okay.  And if you look at -- can you read  15:21

18   the next bullet.                                  15:21

19      A.    "Read_stream (timeline API, Newsfeed    15:21

20            API) being publicly deprecated.         15:21

21            Partner/contract only."                 15:21

22      Q.    Okay.  Do you know what that means and do  15:21

23   you recall that happening?                        15:21

24      A.    I know what I think partner and contract  15:21

25   only means that you have to have a contract, but I  15:21
```

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```
 1        A.    Yes.  I remember the slide.              16:24

 2        Q.    Right.  And you helped develop those      16:24

 3   categories; right?                                    16:24

 4        A.    I don't remember specifically.            16:24

 5        Q.    But your email appears to indicate that you  16:24

 6   helped to develop those categories; right?           16:24

 7        A.    So, again, whatever the email says, but I  16:24

 8   don't remember that specific moment in time.         16:25

 9        Q.    And Miss Chang, do you know how many total  16:25

10   apps and partners were given continued access to     16:25

11   friends permissions?                                 16:25

12        A.    No, I don't.                              16:25

13        Q.    How about read permissions?              16:25

14        A.    I don't.                                  16:25

15        Q.    Do you know if there were records kept of  16:25

16   all the apps and partners that were given continued  16:25

17   access to friends and read permissions?             16:25

18        A.    I don't know.                             16:25

19        Q.    Who would know that?                     16:25

20        A.    I don't -- I don't know.                 16:25

21        Q.    Okay.  You have no idea?                 16:25

22        A.    Not for an individual person, no.        16:25

23        Q.    And so in your work now with academic     16:25

24   partnerships, if you wanted to figure out if an      16:25

25   academic partner had continued access to friends     16:25
```

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```
 1  know if it could be classified as whitelist.        16:28

 2      Q.   The term "whitelist" is not one you have   16:28

 3  used so frequently that you remember to this day    16:28

 4  what it means?                                       16:28

 5      A.   No.                                         16:28

 6      Q.   Do you have any idea of the process that's  16:28

 7  used to determine if an app developer or partner is  16:28

 8  whitelisted so that they have continued access to    16:28

 9  friends permissions?                                 16:28

10      A.   Yeah.  I don't recall it.                   16:28

11      Q.   Do you know if Facebook keeps records of    16:28

12  whitelisted developers/partners?                     16:28

13      A.   I don't know.                               16:28

14      Q.   You have no recollection at all as to       16:28

15  whether that information is collected and maintained 16:29

16  in one place so that someone could easily find out   16:29

17  who are all of the whitelisted partners or           16:29

18  developers?                                          16:29

19      A.   So again --                                 16:29

20           MR. FALCONER:  Asked and answered.          16:29

21           THE WITNESS:  -- that's outside my scope, so 16:29

22  I don't know.                                        16:29

23  BY MR. LOESER:                                       16:29

24      Q.   Now, if we go back to slide -- I'm sorry,   16:29

25  deck -- Exhibit 12 for a minute.  And if you look at 16:29
```

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```
 1          THE WITNESS:  So, again, I don't -- I don't    16:34

 2   remember, so I can't assume.                          16:34

 3   BY MR. LOESER:                                         16:34

 4      Q.   Did you have any interaction with a partner   16:35

 5   in a discussion of the information -- the             16:35

 6   permissions the partner was interested in, where      16:35

 7   they said to you, Hey, we want to arrange so that we  16:35

 8   have permission to access friends_video?              16:35

 9      A.   I don't remember specifically like            16:35

10   individual permissions.                               16:35

11      Q.   Okay.  Do you remember any conversations at   16:35

12   all about friends permissions with any partner?       16:35

13      A.   I don't remember specifically anything about  16:35

14   friends permission.                                   16:35

15      Q.   Do you remember anything generally about      16:35

16   friends permissions?  And particularly, I'm asking    16:35

17   if any partner that you have worked with raised that  16:35

18   as a permission that they were interested in gaining  16:35

19   access to.                                            16:35

20      A.   I don't -- I don't -- I don't recall.         16:35

21          MR. LOESER:  Okay.  We can go to Exhibit 21.   16:36

22          (Exhibit 20 marked for identification.)        16:36

23          MR. LOESER:  Oh, is it 20?  Yeah.              16:36

24          While that's being loaded, for the record,     16:36

25   this is an email from Simon Cross to, among others,   16:36
```

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```
 1   yourself, dated October 24th, 2013, "Subject:      16:37

 2   Capabilities tool improvement request - feedback by  16:37

 3   end of day Sunday, please."  With attachment,        16:37

 4   "Capability audit 24 October 2013," attaching an     16:37

 5   Excel spreadsheet.                                   16:37

 6   BY MR. LOESER:                                       16:37

 7        Q.   Do you see that document, Miss Chang?      16:37

 8        A.   I see the email, yes.                      16:37

 9        Q.   So this email starts with Mr. Cross saying: 16:37

10             "Hi guys, Over the last few weeks,         16:37

11             you'll have noticed Engineering have       16:37

12             moved many app-based GKs over to the new   16:37

13             Capabilities tool.  Going forward, this    16:37

14             tool is going to be a much larger part     16:37

15             of our lives -- it's where the vast        16:37

16             majority of whitelists will be managed.    16:37

17             Platform Simplification is about to        16:37

18             introduce even more whitelists -- such     16:38

19             as allowing apps to be exempt from the     16:38

20             transition to hashed UIDs, or to be        16:38

21             able to continue using read_stream or      16:38

22             friends_permissions."                      16:38

23             Did I read that accurately?                16:38

24        A.   Yes, you -- yes.                           16:38

25        Q.   Do you recall receiving this email and the 16:38
```

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```
 1   attachment that it provides?                            16:38

 2        A.   I don't recall it specifically.               16:38

 3        Q.   Do you recall it at all?                       16:38

 4        A.   No, I don't.                                   16:38

 5        Q.   And can you tell me what "app-based GKs"       16:38

 6   are?                                                     16:38

 7        A.   I don't know.                                  16:38

 8        Q.   You have no recollection whatsoever?           16:38

 9        A.   No.  Again, I'm not -- I'm not the technical   16:38

10   person, so I just don't -- I don't know technically     16:38

11   what it would mean.                                      16:38

12        Q.   Okay.  Do you know what the Capabilities       16:38

13   tool was?                                                16:38

14        A.   Not specifically.  I've heard of it, but I     16:38

15   don't know it in detail.                                 16:39

16        Q.   Well, what have you heard about it?            16:39

17        A.   It looks like some sort of permissioning       16:39

18   tool.                                                    16:39

19        Q.   And what does that mean?                       16:39

20        A.   It grants permissions.                         16:39

21        Q.   Who does it grant permissions to?              16:39

22        A.   So, again, I don't -- I don't know the         16:39

23   technical specifics, so I don't feel comfortable        16:39

24   talking about it in depth because I might                16:39

25   mischaracterize it.                                      16:39
```

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```
 1      Q.    Okay.  You've said all that you feel        16:39

 2   comfortable saying about it?                          16:39

 3      A.    Well, like all that I know about it.         16:39

 4      Q.    And before I asked you if there was a place  16:39

 5   where whitelists were managed, and this seems to      16:39

 6   indicate that the Capabilities tool is where the      16:39

 7   vast majority of whitelists will be managed.          16:39

 8         Does that refresh your recollection about       16:39

 9   where whitelists are managed?                         16:39

10      A.    No.                                          16:39

11      Q.    Okay.  And this uses the term "platform      16:40

12   simplification," which previously we saw you were     16:40

13   tasked with various things having to do with          16:40

14   platform simplification.                              16:40

15         Can you provide any more information on your    16:40

16   understanding of platform simplification?             16:40

17         MR. FALCONER:  Objection.  Form.                16:40

18         THE WITNESS:  No.  Again, this wasn't the       16:40

19   top of like my -- my focus, so I don't really have a  16:40

20   lot of recollection around this.                      16:40

21   BY MR. LOESER:                                        16:40

22      Q.    Do you recall that based on the information  16:40

23   that was sent to you here and the description of      16:40

24   this email, there were thousands of different app     16:40

25   developers and partners that had been whitelisted by  16:40
```

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```
 1   yes, it seems like I'm posing the question.        17:01

 2       Q.   So, certainly, as of the date of this email, 17:01

 3   March 24, 2014, you knew that there would be some   17:02

 4   partners that would require access to deprecated    17:02

 5   APIs for more than 12 months after the new platform 17:02

 6   was introduced; right?                              17:02

 7       A.   So I don't know, at that moment in time.   17:02

 8       Q.   So looking at what you wrote, you're telling 17:02

 9   me you can't determine, based on what you wrote,    17:02

10   that there were some partners that would require    17:02

11   access to APIs beyond the 12 months outlined for    17:02

12   PS12N?                                              17:02

13       A.   I know what I wrote, but I don't remember it 17:02

14   in specificity where I would know the full context 17:02

15   of what you're implying.                            17:02

16       Q.   Okay.  Do you have any reason to believe    17:02

17   that the information that you wrote in this email is 17:02

18   inaccurate?                                         17:02

19       A.   I don't know.                              17:02

20       Q.   You don't have any reason to believe that,  17:02

21   do you?                                             17:02

22       A.   I mean, there's always a possibility of     17:02

23   inaccuracy, but I don't know.  It's not my intent to 17:02

24   be inaccurate.                                      17:03

25       Q.   Did you have any involvement at any point in 17:03
```

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From:	Konstantinos Papamiltiadis </O=THEFACEBOOK/OU=EXTERNAL (FYDIBOHF25SPDLT)/CN=RECIPIENTS/CN= 942ACCD3D3C54FBEA8B7253E97A8A6D7>
Sent:	Wednesday, August 21, 2013 8:09 AM
To:	Ime Archibong; Jackie Chang
Cc:	Chris Daniels; Simon Cross
Subject:	Re: T0/Special Cases for P3 consideration
Attachments:	All apps with friends permissions.xlsx

+ Simon

Thanks a lot, Jackie. This is great – I have included the additional info for the strategic partners in the attached spreadsheet as well (for completeness).

A little update from my end, and how I think we should tie this to what Jackie has put together. Simon managed to pull a list of 40k+ apps that request and make use of the friends_permissions. You can see all of those apps in the attached. The most interesting data points having reviewed the top 250 apps are the following (I took the liberty to make a recommendation as well btw – the numbers in the brackets are the percentage of the apps reviewed under this category):

1/ Games (25%): All games request access to friends lists and on top of this friends_games_activity. The main reason is user acquisition through social referral. Typical example is Candy Crush, invite your friends to get an extra 5 lives. Removing access to the full friends list for those app will seriously affect this vertical and how they see FB as a platform for growth via organic and paid for channels. My recommendation is: KEEP ACCESS

2/ In-house App/ Mobile (12.5%): No brainer this one, we need to maintain access for all our apps as well as the "approved mobile ones". Recommendation: KEEP ACCESS

3/ Strategic (12.5%): From MSFT, to Yahoo!, to Pinterest, Path, Klout and the likes. Some of them should obvious not have access such as Myspace, Twitter, Youtube, etc. In particular for Strategic partners we should use the framework developed by Jackie. RECOMMENDATION: User Jackie's framework

4/ Comms (6%): Unlike the other audit, a lot more Comms apps appear in this list. If we restrict access to user's friends that already use the app we would seriously affect the growth of their business. However, I think we need to take a hard stance on this one and don't offer any exceptions given they are not contributing with edges and/or NEKO spend. Recommendation is: REMOVE ACCESS

5/ Lifestyle (18%): Surprising a lot apps listed here, mostly focused on Dating, and to a lesser extend on social influence (this was the dominant category for newsfeed inside Lifestyle). The use of Friends list is totally justified here, if I may say. I would love to know if Girl A is a friend of a friend before I approach her and ask her to meet – I suspect this use case is even more important for female users of those apps that want to have a degree on confidence on the quality of their data. My recommendation is: KEEP ACCESS. This may surprise you, but I am working on a deck to assess the opportunity for this vertical and I think besides NEKO, we can really tap into this vertical and improve the Identity data we hold for our users, while increase our revenues. My plan was to finish this before the end of the week (when I am off on holidays), but most probably I will conclude it when I am back.

6/ Photosharing (7%): Also a surprising number of apps fall under this category. Friends list is core to sharing photos and video with people that don't necessarily use the app. Us removing full access to the friends list would require significant changes from those devs. Recommendation is: REMOVE ACCESS

1

7/ Astrology (4%): Considerable number of apps on this vertical. They need access to friends bdays to come up with predictions. They products will be broken without this, however, I am not sure if it's a vertical that makes sense for us. Recommendation is: REMOVE ACCESS

8/ Media/Music/Books/Fitness (7%): Invite friends, mention tagging are the main use case here. However I don't think we should allow them access to this and we should treat partners and devs in this vertical fairly with no exceptions. Recommendation is: REMOVE ACCESS

9/ Unknown and Replicas (8%): Most of the unknown are in fact developed by the same PMD, investigating. In any case, those apps should not be able to access the full friends lists anyway. Recommendation is: REMOVE ACCESS

As a general note, I think we need to carry on with this exercise to figure if there are more apps falling under different verticals that we have not identified yet, before we can make a decision for all the apps in this vertical. For both the Newsfeed and the Friends permission audit, we can use Jackie's framework to assess KEEP/REMOVE for those partner falling under the Strategic tabs and then make up a decision based on the criteria outlined by Jackie below.

Let me know what you think,
kp

....

From: Ime Archibong <ime@fb.com>
Date: Wednesday, August 21, 2013 6:31 AM
To: Jackie Chang <jackie@fb.com>
Cc: Chris Daniels <chrisd@fb.com>, Konstantinos Papamiltiadis <kpapamiltiadis@fb.com>
Subject: Re: T0/Special Cases for P3 consideration

Thanks, Jackie. Glad you two linked up on this work. Looks like you have the right buckets flagged. One nitpick suggestion would be to consolidate the last two categories in the risk assessment tab under some term that represents "significant partner thrash." We know that there is going to be some partner thrash coming out of these changes, but we're just looking to minimize it and navigate it thoughtfully.

Sent from my iPhone

On Aug 21, 2013, at 2:30 AM, "Jackie Chang" <jackie@fb.com> wrote:

> Ime & Chris,
>
> Working with KP to further synthesize P3 impact by breaking out T0 partners with non-standard agreements and specific categories of impact that we should address. KP is working on the pulling the same analysis of the friend data, but we're also working in parallel to parse out key partnerships/scenarios that we should be solving for:
>
> https://docs.fb.com/sheet/ropen.do?rid=osbge9fce0156e72340bc9b80ea4fa6bdc2f8
>
> T0 Tab:
>
> - Partners with non-standard agreement and their backward compatibility clause.
> - Existing integrations impacted
> - Future integrations in planning
>
> Risk Assessment Tab:
>
> - PR risk: Potential partners/cases that may cause negative press
> - Strategic Value: Key integrations that use read stream or friend data and drive value to fb. Should decide if we allow certain use cases that are of strategic value to fb.

2

- Competitive/Not Useful to FB: Key integrations that are competitive or drive little value to fb. Good that we're removing, but may need some additional considerations on wind-down time.
- Major Business Disruption/Kill: Noticeable integrations who's whole business is built on stream or friend data. Should be part of PR flag.
- In the Pipeline: Partner integration in the works where they've been working with someone at fb. This may be difficult to message as our sales team went to some of these partners a pitched and opportunity that they worked with them closely on.

This should be complete by EOW; however, Constantin will be using this on Thurs for a discussion with Vernal on how to tackle edge cases. Let us know of any feedback.

Thanks!
Jackie

3

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_____

From:	Simon Cross </O=THEFACEBOOK/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SIMON CROSS>
Sent:	Tuesday, December 10, 2013 12:28 PM
To:	Jackie Chang; Ime Archibong; Konstantinos Papamiltiadis; Bryan Hurren; Monica Mosseri
Subject:	Re: Simon's Updates - 6th Dec

HTML5 Embeds on www

- Soundcloud plan to launch around Dec 22nd or may delay until 2nd week in Jan
- Work on both sides to map out embed points, and fix any bugs before we look to lauch.
- Need to raise with the Feed team to get final OK to launch

Platform Simplification

- Capability Audit – partnerships teams coming close to categorizing each of their apps as production, to be sandboxed, or to be removed. Next step is work with DevOps to Sandbox these apps or remove them from the capability tool altogether
- New Whitelists & table of affected apps – new Capability list locked with Product and Eng. Prototype affected apps table built – now being checked by analytics team before being setup to run each day – will be used by dev ops, scaled outreach and platform marketing to identify key apps to handhold, and by partnerships to identify key use cases we need to whitelist

Location

- Approval from Zuck and Vernal to continue along the chosen path with Nokia/Here (POI exchange, we get map data/renderer, they get user data via Platform). Next steps are to sharpen up the work on FB's side to give them access to user location data (with consent) via Platform, and which new APIs we need to build to support that.
- Beginning to plan strategy for H1 around POI data acquisition from aggregators or via affiliate deals

Apple Affiliate deal (Hunch)

- Deal dragging on longer than expected – still waiting for a response from Apple. Slim possibility we may close in 2013, but more likely now in early 2014
- Product is happy to hold (for now) until the deal is done.

--
Simon Cross
Product Partnerships, Facebook

From: Simon Cross <si@fb.com>
Date: Monday, November 25, 2013 at 8:41 AM
To: Jackie Chang <jackie@fb.com>, Ime Archibong <ime@fb.com>, Konstantinos Papamiltiadis <kpapamiltiadis@fb.com>, Bryan Hurren <bryanhurren@fb.com>, Monica Mosseri <mwalsh@fb.com>
Subject: Re: Simon's Updates - 22nd Nov

1

Instant Personalization Deprecation

- Met with Trip Advisor onsite in MPK. They were disappointed with our decision to kill IP but they understood our message about consistency and were glad we're working to improve conversion across the board. We told them Jan 31 was the cutoff date. We agreed to work with them to design and optimize their post-IP FB integration.

HTML5 WWW Embeds

- SoundCloud weeks away from launching their new album-art image heavy widget. Ime and I working to get approval to ramp their HTML5 widget to 100% of users (currently 1% of users and 100% of employees not in litestand). Some eng work needed on our side, and a security review likely, but no other major blockers other than bandwidth on our side.

Platform Simplification

- Capability Audit - Audit of 5200 currently-witelisted apps about to begin – should take around 3 weeks – goal is to put 80% into sandbox mode or remove them from the whitelists altogether, and have 80% of the remaninig non-sandboxed apps listed with tier owners in Salesforce
- New Whitelisting process – Jakie working closely with Marie and Legal to design a fast but safe process for whitelisting apps. Spec for updates to tools in progress and moving towards build-stage. Audit of existing Capabilities for legal risk is underway
- New Whitelists for public deprecations – close to finalizing with Product (Eddie and Harshdeep) a set of 54 new Capabilities we need to add to allow us to whitelist partners past the public deprecations. Next step is to map apps against these and start making no/extension/exemption decisions.

Location

- Met with Nokia/Here to scope out the Place and User location data we'll make available via Platform as part of our deal (in which we'll acquire their mapping vectors and rendering engine in return). Subsequently met with Vernal who signed off on the approach. Need another iteration on the exact API methods which need to be improved/built, and the specific feedback-targets we need them to implement.
- Starting to work more closely with the Location team around their plans for POI data acquisition, place annotation data (menus, food imagery etc) and deeper user actions (price comparison, bookings etc). Out of this may fall strategic partnerships beyond Platform with folks like TA, 4sq as well as companies new to us like MenuPages. Early days for this work stream, and the team is still settling in from the re-org – so please forward request around Location to Me+Rob rather than going directly to the product team so as to reduce thrash for them.

S

--
Simon Cross
Product Partnerships, Facebook

From: Simon Cross <si@fb.com>
Date: Friday, November 8, 2013 at 6:59 PM
To: Jackie Chang <jackie@fb.com>, Ime Archibong <ime@fb.com>, Konstantinos Papamiltiadis <kpapamiltiadis@fb.com>, Bryan Hurren <bryanhurren@fb.com>, Monica Walsh <mwalsh@fb.com>
Subject: Re: Simon's Updates - 8th Nov

PLATFORM

Mobile Music Previews

2

- Spotify sent us their 50 test tracks so the team can get testing
- Spotify gave us some asks for logo attribution on the new mobile music stories. We tentatively agreed on attribution on Album art (theres precedent there) but pushed back on attribution on the track picker on the menu which appears with the stories are flipped over
- Rdio still blocked, but they told us one label (Sony) asked if Rdio could push us to do full-length tracks in the FB app but where the track would only play once. Sony pinged Ime about this separately. We're going to have a call to tease this out some more, and sync with Aryeh on if this is a thread worth following

Instant Personalization Deprecation

- KP had a call with Trip Advisor who have some feedback/concerns about this materially affecting their business. We need to work through these to drive deprecation by Jan 31

Login v4

- Rdio are back in for the Login v4 Beta. They confirmed that an FB account (all users >13 years old) is enough age data for them and so they're going to drop DOB as a required fields. Graham is working to on board them onto the Beta.
- The Login team are looking at using App Events to measure login preference and pre-login behavior in a few key apps. Spotify are looking to better instrument their login/reg funnel so we pitched them on this idea. Call next week with Spotify to discuss the details.

Platform Simplification

- Landed on a clear 5-stream plan for the work we need to do to prep for PS12n – Defined leads for each work stream who spent the week planning and divvying up tasks: https://our.intern.facebook.com/intern/projects/milestones/?id=1434646163424174
- Arranging a Partnerships + Ops + PMD/Solutions Eng all hands focussed on PS12n with Vijay and Eddie to spread the rational, the vision and the plan across the teams who'll be touched by these changes.
- Key focus this week is to pull additional data on apps and capabilities to allow the 4 partnerships teams (Games, Non-games, Mobile, Marketers) to pre-approve apps for the new whitelists, and review their apps with existing whitelists
- Jackie leading on putting together a new whitelist process with Legal and Product.

--
Simon Cross
Product Partnerships
www.facebook.com/sicross   @sicross
Facebook, 1601 Willow Road, Menlo Park, CA 94025, USA

From: Simon Cross <si@fb.com>
Date: Monday, October 28, 2013 at 10:40 AM
To: Jackie Chang <jackie@fb.com>, Ime Archibong <ime@fb.com>, Konstantinos Papamiltiadis <kpapamiltiadis@fb.com>, Bryan Hurren <bryanhurren@fb.com>, Monica Walsh <mwalsh@fb.com>
Subject: Re: Simon's Updates - 25th Oct

PLATFORM

Mobile Music Previews

- Spotify have coverage for 80% of their catalogue. Shipping 50 test URLs to us this week, awaiting updated mocks from us to share with their label relations team to unlock the previews for the catalogue coverage they have
- Rdio still blocked my labels but shipping 50 test URLs this week also

3

Event Playlists

- Rdio flow working end to end
- Eng/Product work on our side paused to allow us to ship Snacktime, but will revisit event playlists before year end

Instant Personalization deprecation

- 2 partners (Yelp and Rotten Tomatoes) committed to deprecate by year-end
- TripAdvisor – KP speaking them this week
- Bing – deprecation backed up behind delicate search/maps contract negotiations – hope to deprecate once new agreement is signed

Login v4

- Rdio may be back in the Beta if they their lawyers allow them to know only if a user is 13+ (which is all FB users), rather than requiring their full DOB. Update this week

HUNCH

Affiliate deals

- Discussions ongoing with Apple, deadline tight. Iterating on UX requirements, the in-FB surfaces the agreement covers and our planned use of the reconciliation/purchase data feed we get as part of their deal

--
Simon Cross
Product Partnerships
www.facebook.com/sicross   @sicross
Facebook, 1601 Willow Road, Menlo Park, CA 94025, USA

⋯⋯⋯

From: Simon Cross <si@fb.com>
Date: Friday, October 11, 2013 5:33 PM
To: Jackie Chang <jackie@fb.com>, Ime Archibong <ime@fb.com>, Konstantinos Papamiltiadis <kpapamiltiadis@fb.com>, Bryan Hurren <bryanhurren@fb.com>, Monica Walsh <mwalsh@fb.com>
Subject: Simon's Updates - 11th Oct

<u>**PLATFORM**</u>

Auth'd Referrals Deprecation is done!
- Spotify and iHeartRadio both no longer using auth'd referrals
- All other straggler partners and test apps rolled off also – no one using it anymore to our knowledge

Login v4
- Pitched being beta v4 partners to iHeartRadio and Rdio – both declined due to v4 allowing users to not pass an email – neither app has the bandwidth to update their apps to cope with this. Given this feedback to Product who are rethinking how to test
- Pandora will tell us on Weds if Login is going to be within their next 6 months roadmap. Fingers Crossed. We have done everything we can to convince them.

Mobile Music Previews
- Spotify to have tags on 50 tracks by the end of next week – hope to have more info from labels on full deal by end of Oct

4

- no updates from Rdio

Mobile Radio Station Stories
- iHeartRadio pitched their vision of what they'd like to see us build for radio stories – passed this to the product team
- Pandora also have ideas – they're going to work them up and send them over in a couple of weeks

Event Playlists
- Rdio added to the Gks and starting to do end to end testing of the export flow

HTML5 Embeds
- Med SoundCloud who pushed us again on enabling HTML5 embed for them. Purely a bandwidth/effort issue on our side to get this across the line – not high-pri, so made no firm commitments.

Platform Simplification
- major product update: we're moving to hashed user-Ids. This has impact every single app on platform – still analyzing impact of this on planning – will most heavily affect games and marketing-based apps.
- collated names of companies we thing we have contracts with – next step is to audit these contracts for extended deprecation commitments
- Dev Chakravarti joined the team as data analyst – helped him ramp up on how to analyze the effects of PS12n on the whole ecosystem
- Preparations continue for capability audit – need to write out Capability maps to Hive

HUNCH
Apple are sending us new terms which we may have to negotiate from scratch – this may put us back and increases the risk we won't have the affiliate deal done for Hunch launch. We're still awaiting their new contract so will have more info on eta impact hopefully next week.

LOCATION
Met with Emily Grewal who's interested in us helping her team acquire menu data and food imagery (food spotting) to improve our restaurant discovery product. They're also interested in us helping them acquire more POI data. Early stages, but preparing the ground for effort here in Q1 2014

Bonus:

I Worked on a send-to-mobile feature where we send a mobile push notif when you install an app on the web – this drives you to install the app on your device. Was picked to present to Zuck at mini-prototype forum next Tues (10/15). Feedback more broadly has been positive, so looking at changes/features and roadmap to help this ship.

S

--
Simon Cross
Product Partnerships
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Facebook, 1601 Willow Road, Menlo Park, CA 94025, USA